



Reed Smith LLP  
 Three Logan Square  
 Suite 3100  
 1717 Arch Street  
 Philadelphia, PA 19103  
 +1 215 851 8100  
 Fax +1 215 851 1420  
 reedsmith.com

**John N. Ellison**  
 Direct Phone: +1 215 241 1210  
 Email: jellison@reedsmith.com

April 17, 2025

**Via ECF and Hand Delivery**

**Part I**

Hon. Judge Edgardo Ramos  
 United States District Court  
 Southern District of New York  
 Thurgood Marshall U.S. Courthouse  
 440 Foley Square  
 New York, NY 10007

**Re: ABC v. DEF, Case No. 1:25-mc-00167**

Dear Judge Ramos, designated as Part 1 Judge as of today's date:

We write jointly on behalf of Petitioner Tyson International Company, Limited ("TICL") and Respondent Partner Reinsurance Europe SE ("Respondent," or "PartnerRE"), in the above-referenced miscellaneous action, filed on April 16, 2025 by Petitioner Tyson International Company, Limited ("Petitioner," or "TICL") and styled as *ABC v. DEF*.

We write to inform the Court that the motion to seal was not intended to be filed *ex parte*. TICL provided advance notice to PartnerRe that they would be filing a motion to seal certain materials, and PartnerRe declined to join in the motion. After filing the motion to seal, TICL served a copy on PartnerRe immediately, making them aware of the filing. In addition, TICL has no grounds to seek *ex parte* relief here and thus withdraws that aspect of its motion seeking relief *ex parte*.

We further write to inform the court that the case was not intended to be filed under seal entirely, including with an anonymous case caption. The case caption should be Tyson International Company, Limited v. Partner Reinsurance Europe SE. We therefore also withdraw that aspect of the motion to seal which purports to seek to file the entire case or the case caption under seal. There is no legal basis to seal the entire case, including the case caption. *Doe v. Berg*, No. 15-CV-9787 (RJS), 2016 WL 11597923, at \*1-2 (S.D.N.Y. Feb. 10, 2016).

Finally, in connection with counsel for PartnerRe, Victoria Corder of Norton Rose Fulbright US LLP, the parties have agreed that the motion to seal may be entered temporarily until a briefing schedule on TICL's motion to seal is set by the assigned judge.

Therefore, we respectfully ask the Court modify the relief sought in the motion to seal to give notice and an opportunity to be heard to PartnerRe, to only grant the relief requested on a temporary basis and decline to seal the entire case or case caption.

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We thank the Court for its consideration of these issues.

Very truly yours,



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John N. Ellison

JNE/sc